

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

FIREMAN'S FUND INSURANCE	:	CIVIL ACTION NO.:
COMPANY	:	04-11578 PBS
	:	
v.	:	
	:	
FIRE SYSTEMS, INC.;	:	
FIRE SUPPRESSION SYSTEMS OF	:	
NEW ENGLAND, INC.;	:	
PRO CON, INC.	:	
and	:	
PAQUETTE ELECTRIC COMPANY, INC.:	:	
Defendants	:	AUGUST 21, 2006

**PLAINTIFF FIREMAN'S FUND'S RULE 26(a)(2)(A)
DISCLOSURE OF EXPERT WITNESS**

NAME AND ADDRESS OF WITNESS

Doug Maxwell
29 Henry Street
Mansfield, MA 02048

SUBJECT MATTER ON WHICH THE EXPERT IS EXPECTED TO TESTIFY

Mr. Maxwell is expected to testify concerning his investigation, adjustment, and presentment of the insurance claim submitted by Hodan Properties related to the January 19, 2003 pipe-freeze and water damage loss that occurred at the Residence Inn, 181 Faunce Corner Road, North Dartmouth, Massachusetts.

**THE SUBSTANCE OF THE FACTS AND OPINIONS TO WHICH THE EXPERT
IS EXPECTED TO TESTIFY**

Mr. Maxwell is expected to testify that, based upon his investigation and adjustment of insurance claim related to the January 19, 2003 pipe-freeze, the damages incurred by Hodan Properties (including building, contents and business income loss portions) were in excess of \$2,043,850.52.

SUMMARY OF THE GROUNDS FOR EXPERT'S OPINION

Ms. Maxwell will testify based on his education and experience as a public adjuster, as well as his investigation into Hodan Properties' insurance claim and inspections of the Residence Inn premises, located at 181 Faunce Corner Road, North Dartmouth, Massachusetts.

THE PLAINTIFF,

By: 

Erik Loftus, Esq.
Law Offices of Stuart G. Blackburn
Two Concorde Way
P. O. Box 608
Windsor Locks, CT 06096
860-292-1116
BBO# 656315

**IN THE UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

FIREMAN'S FUND INSURANCE	:	CIVIL ACTION NO.:
COMPANY	:	04-11578 PBS
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FIRE SUPPRESSION SYSTEMS OF	:	
NEW ENGLAND, INC.;	:	
PRO CON, INC.	:	
and	:	
PAQUETTE ELECTRIC COMPANY, INC.	:	
Defendants	:	AUGUST 21, 2006

I hereby certify that on **August 21, 2006**, a copy of foregoing **Plaintiff Fireman's Fund's Rule 26(a)(2)(A) Disclosure of Expert Witness** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Erik Loftus, Esq.
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